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11/20/09

Teresa Rancourt
Former President, of Former PCT Construction, Inc.
C/O SA Service Company LLC
Former Registered Agent for the Former PCT Construction, Inc.
701 Fifth Ave., Suite 4400
Seattle, WA 98104-7012

November 20, 2009

Hand Delivered

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DEC 01 2009
Environmental
Cleanup Office

United States Environmental Protection Agency, Region10
Claire Hong, Remedial Project Manager
Environmental Clean-up Office, ECL-111
1200 Sixth Avenue
Seattle, WA 98101

RE: Request for Information Pursuant to Section 104 (e) of CERCLA for the Lower Duwamish Waterway Superfund Site, Seattle, WA: PCT Construction, Inc.
Site: Lower Duwamish Waterway, King County Parcels: 6871200651, 6871200660 address 7225 2nd Ave, S. Seattle, WA 98108

Dear Ms. Hong:

I have received the above referenced request for PCT Construction, Inc. The former PCT Construction, Inc. was a Washington State Corporation that was formally and legally dissolved May, 2006. (Please reference Exhibit 1 for dissolution documentation). PCT Construction, Inc. was liquidated and did not transfer or assign any assets to any other company or entity.

In good faith and cooperation with the EPA, as former president of PCT Construction, Inc., I am enclosing responses to EPA's Request for Information following the format specified by EPA and including documents responsive to this request. Some of these documents are confidential, have labeled as such, and have been included on a separate disk.

Briefly, allow me to summarize the extent of the former PCT Construction, Inc.'s involvement at and around King County Parcels: 6871200651, 6871200660:

- PCT Construction, Inc. rented approximately 11,000 square feet of King County Parcels: 6871200651, 6871200660 from Boyer Towing and Logistics as a storage yard for construction vehicles and construction materials, from 11/2003 through 12/2005. The former PCT Construction, Inc. did not conduct any of its construction operations at this

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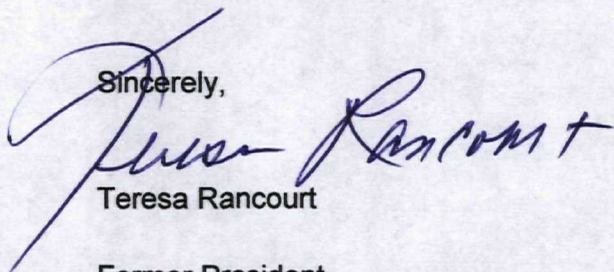
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Site. The rented locations had no water access and were located at least +/-500 feet from the thread of the Duwamish Waterway. PCT's construction equipment and construction materials stored on the Site consisted of: three trucks, traffic control equipment such as cones, barrels, barricades, small mobile concrete mixers, two 20-foot mobile storage containers and a 40 foot truck trailer used for storage. Construction materials consisted of lumber (all non-treated), steel beams, miscellaneous nails, bolts, visqueen etc.

- PCT did not conduct any fabrication, equipment maintenance or fueling, painting, demolition, or recycling activities on the Site. Nor was any electrical equipment used on the Site.
- PCT Construction, Inc. did not store, create, release, nor dispose of any hazardous substances, pollutants or contaminants at the Site.
- PCT Construction, Inc. did not know whether any such substances were handled at the Site prior to or subsequent to its rental of the location.
- Also, the former PCT Construction, Inc. rented its main office/warehouse space at 7400 Third Ave. South, Seattle Wa. 98108, located within ½ mile of the Site but approximately +/- 540 feet from the thread of the Duwamish Waterway, from 1997 through the company's dissolution in May, 2006.

Please feel free to contact me if you have any questions concerning the responses provided in the attached materials.

Sincerely,

A handwritten signature in blue ink, appearing to read "Teresa Rancourt", with a large, stylized initial "T" that loops around the first part of the name.

Teresa Rancourt

Former President
Former PCT Construction, Inc.

US EPA CERLA Section 104 (e) Information Request Response

Respondent: The former PCT Construction, Inc. ("PCT")

All answers to the US EPA CERLA Section 104 (e) Information Request Response follow the same number format to number format of the question to which it responds.

1. Respondent Information

- a. The full legal name of the Respondent was PCT Construction, Inc. As PCT was legally dissolved May, 2006 (See Exhibit 1 for dissolution documentation) it does not have a mailing address nor as of this date does it have a registered agent.
- b. In an effort of good faith and cooperation with the EPA, Teresa Rancourt, former president of PCT, is willing to answer the US EPA CERLA Section 104 (e) Information Request to the best of her knowledge.
 - Teresa Rancourt
 - Former President, PCT Construction, Inc.
 - No business address
 - No business phone, no fax number
- c. All future correspondence shall be addressed to: Teresa Rancourt, former president of the former PCT Construction, Inc. C/O SA Services (former registered agent for the former PCT Construction, Inc., 701 Fifth Ave., Suite 4400, Seattle, WA 98104-7012.
- d. PCT. rented a storage yard from Boyer Towing & Logistics which was a portion of the two named parcels identified in US EPA CERLA Section 104 (e) Information Request King County Parcels as 6871200651 6871200660 (hereinafter the "Site"). This yard space was rented on a month to month basis from 11/2003 through 12/2005. In addition, PCT rented its main office/warehouse space at 7400 Third Ave. South, Seattle WA. 98108 (hereinafter "7400 Third Ave. So.") which was within a ½ mile of the site, but at least +/-540 feet from the thread of the Duwamish Waterway. PCT's rental of this space ran from 1997 through its dissolution in May 2006.
- e. As noted in 1.d, PCT rented a portion of the Site from 11/2003 through 12/2005. From 1997 through May, 2006, PCT also rented an office/warehouse property at 7400 Third Ave. S, which was within a ½ mile of the Site but +/- 540 feet from the thread of the Duwamish Waterway.
- f. The former PCT Construction, Inc. used the Site only for the storage of construction materials and equipment for its construction projects. No hazardous waste was stored or generated on the Site and no fabrication, demolition, maintenance or painting was conducted on Site. The types of construction materials and vehicles are listed under Section 1.g. PCT conducted its businesses of construction management, business management, business marketing, estimating and bidding, storage and staging of labor and materials at its main office/warehouse location at 7400 Third Ave. S.

- g. Nothing was fabricated, maintained or used at the Site by PCT. The site was for the storage of construction materials and equipment only. Any use or staging of materials or equipment was taken off site to their respective construction projects or to PCT's main office/warehouse location or to a licensed mechanic. The materials stored on the Site were: lumber (all non-treated), steel beams, miscellaneous nails, bolts, visqueen etc. Equipment consisted of three trucks, traffic control equipment such as cones, barrels, barricades, small mobile concrete mixers, two 20-foot mobile storage containers and a 40-foot truck trailer used for storage. No hazardous materials, debris or other wastes were stored or generated on the Site during PCT's occupancy.
- h. Not applicable. No bankruptcy filed.

2. Site Activities and Interests

- a. PCT has no documents whatsoever as to the ownership of Site other than King County public records. PCT rented a portion of the Site from Bower Towing & Logistics, Inc for from 11/2003 through 12/2005. There was no lease arrangement. PCT was billed by Boyer Towing & Logistics, Inc. monthly for this arrangement. As to environmental conditions of the Site, the Site was covered with various size of crushed gravel including 3 inch x 3 inch rip rap. Any deficiencies either were covered or not apparent. Discussions with Boyer Towing & Logistics did not indicate that there were any deficiencies. The only other information of environmental conditions of the Site were those referenced in the attached Phase 1 Environmental Assessment of PCT's main office/warehouse property at 7400 Third Ave. S Seattle, WA dated 11/2005 Section "EPA & State Records of Potentially Hazardous Sites". The Assessment concluded that there were no CERCLIS or NPL sites within the ½ miles radius of PCT's 7400 Third Ave. S Location. (Attached as Exhibit 2 is the Phase 1 Environmental Assessment of PCT's main office/warehouse property at 7400 Third Ave. So. Seattle, WA dated 11/2005).
 - i. PCT Construction, Inc. had no knowledge of any prior occurrences identified in Question 2.a.i, nor did it have any during its rental of the Site, nor did PCT have any knowledge of such activities subsequent to PCT's rental of the Site.
 - ii. PCT Construction, Inc. had no knowledge of any prior occurrences identified in Question 2.a.ii, nor did it have any during its rental of the Site, nor did PCT have any knowledge of such activities subsequent to PCT's rental of the Site.
 - iii. PCT Construction, Inc. had no knowledge of any prior remediation or removal of contaminated soils, sediments, or other remedial at the Site nor was any done during its rental of the property.
 - iv. PCT Construction, Inc. had no knowledge of any investigations at the Site. As referenced above, PCT Construction, Inc. had a copy of the Phase 1 Environment review at 7400 Third Ave. (Exhibit 2). PCT also had a copy of a Soil Sampling Report undertaken by RK Kuroiwa for its 7400 Third Ave. So. office/warehouse location dated 2/14/2006, a copy of

which is included as Exhibit 3. The report concludes a "non-detect to very low and do not pose a risk nor impose a cleanup requirement of the site owner."

- b. The site was a vacant fenced storage lot with a base of covered with various sizes of crushed gravel including 3 inch x 3 inch rip rap gravel when PCT rented space and was returned the same way to Boyer Towing & Logistics at the end of PCT's rental period 12/2005. PCT did not add any fill material; undertake any improvements, alterations, additions, demolition or any other such activities in the area occupied by PCT during PCT's occupancy. PCT was not aware of any of the similar activities prior to or subsequent to PCT's rental period.
- c. This Site is not on the water, therefore dredging is not relevant. In any event, PCT Construction, Inc. had no knowledge of any prior dredging, nor did it have any during its rental of the Site, nor did PCT have any knowledge of such activities subsequent to PCT's rental of the Site.
- d. The former PCT Construction, Inc. used the Site for the storage of construction materials and equipment only as defined in 1.g. No industrial activities were conducted by PCT at the Site. PCT did not do any fabrication, vehicle maintenance, fueling on Site or; have electrical fixtures on the Site.
- e. There was no hazardous, scrap material or recyclable materials used by PCT at the Site.
- f. No electrical equipment was used by PCT at the Site.
- g. Nothing was "used" at the site. Again, the Site was simply a storage yard for PCT. Any vehicle stored on site needing oils, fluids or maintenance was taken to a licensed mechanic located offsite.
- h. The Site occupied by PCT had no visible drainage. As stated under Section 2.b., the Site was a fenced gravel storage yard. Any site drainage was the responsibility of the owner of the Site, Boyer Towing & Logistics. PCT had no knowledge of any site drainage plans, descriptions, plans or maps pertaining to the Site and none was supplied by the Owner. PCT did have its own operational Spill Prevention Plan in case one of the three vehicles stored on Site had a leak. As a matter of business practice, each PCT vehicle contained its own spill kit. Any vehicle stored for a length of time would have had spill pads placed under its engine. As a standard business practice, PCT had its vehicles regularly maintained by a licensed mechanic. There were no spills during PCT's occupancy of the Site.
- i. PCT had no knowledge of any studies past or present of storm water or drainage at the Site. PCT was a 100% Washington State public works contractor and as such, PCT did have Spill Prevention Control and Counter Measure (SPCC) Plans and Temporary Erosion and Sediment Control (TESC) Plans for its operations and its construction projects. Once PCT was formally dissolved and completed its last closeout operations, all of its hard copy files and hard disk files were taken to a large garage structure owned by Teresa and Michael Rancourt in Sandpoint,

Idaho. In 2/2008, the roof of this structure collapsed under heavy snow loads destroying the building and most of the contents in the building including PCT's project files, some accounting files, operational files including most of PCT's SPCC and TESC plans. However, for EPA's convenience and understanding of PCT's business practices attached as Exhibit 4 is a sample of one such SPCC and TESC plan—prepared and maintained for an eastern Washington construction project that that was not destroyed and that is typical and representative of PCT's plans. There were no permits of any nature needed or obtained by PCT during its occupancy of the Site. PCT had no knowledge of any such permits either prior to subsequent to its occupancy.

3. Information About Others

- a. Description of business relationship regarding the property or operation thereon:
 - i. Boyer Towing & Logistics: As defined in earlier Sections, the former PCT Construction, Inc. rented a portion of the property (Site) from Boyer Towing & Logistics for storage only also as described in other Sections. There was no lease agreement, only month to month billing by Boyer and payment by PCT.
 - ii. CDM Constructors Inc.: PCT had no knowledge, business or other relationship with this entity.
 - iii. Kelly-Ryan Inc.: PCT had no knowledge, business or other relationship with this entity.
 - iv. Sound Delivery Logistic, Warehouse, and Service: PCT had no knowledge, business or other relationship this entity.
- b. None known.
- c. There was no storage, handling or removal of hazardous material during PCT occupancy of the Site. PCT had no knowledge of any such activities prior to or subsequent to its occupancy.

4. Financial Information

- a. Attached as Exhibit 5 are PCT's 2004, 2005 2006 and 2007 tax returns and schedules. The former PCT Construction, Inc. was legally dissolved in 2006, with 2007 being its final tax return filing. Consequently, no further returns were or have been filed. All the attached tax returns and schedules are Confidential Business Information (CBI).
- b. None
- c. None

5. Insurance Coverage

- a. Attached as Exhibit 5 are copies of insurance policies in place during PCT's occupancy of the Site. Please note the endorsements as additionally insured: Pacific Concrete Technologies, Inc., which was PCT Construction, Inc.'s former name; and TMR Northwest, LLC, PCT Construction, Inc.'s landlord at its office/warehouse location.
- b. None
- c. Insurance brokers for the former PCT during its occupancy of the site included Brown & Brown Insurance and Propel Insurance (formerly Bradtrud Middleton. Brown & Brown's address is 2101 4th Ave. Suite 600, Seattle, WA 98121 and; Propel Insurance address is 925 Fourth Ave Suite 3200, Seattle, WA 98104. Attached as Exhibit 6 is: 1) a memo from Brown & Brown and; 2) a memo from Propel Insurance both listing the names of the insurance brokers and agents and types of insurance placed.
- d. No claims regarding the Site were made by PCT.
- e. No claims regarding the Site were made by PCT; hence no settlements were made during PCT's occupancy of the Site. PCT had no knowledge of any outside settlements prior to or subsequent to its occupancy of the Site.
- f. Due to the fact that PCT Construction, Inc. was legally dissolved in 2006, as former President, I, Teresa Rancourt, personally keep PCT's records to the minimum requirements of the IRS. Consequently, I have all of PCT's prior financial information, including accounting and insurance files. These files are kept at 247 Grouse Creek Cut-off Road, Sandpoint, Idaho 83864.
- g. Due to the fact that PCT Construction, Inc. was legally dissolved in 2006, as former President, I Teresa Rancourt personally keep PCT's records to the minimum requirements of the IRS. Consequently, I have all PCT's prior financial information. As to other types of records, most were in hard copy format which were held for the required two year period subsequent to PCT's dissolution and until the building collapse which destroyed the majority of these documents as described in Section 2.i.

6. Compliance with This Request

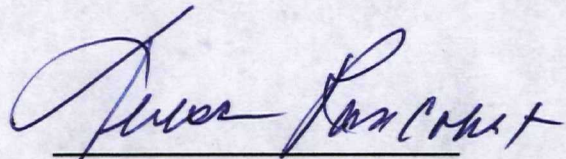
- a. Sources consulted
 - Teresa Rancourt, former president of the former PCT Construction, Inc. This was Mrs. Rancourt's last employer. The business has no forwarding address as it was formally and legally dissolved in May, 2006. Mrs. Rancourt is currently retired.

- Documents reviewed are currently located at: 247 Grouse Creek Cut-off Road, Sandpoint, Idaho 83864.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of the Respondent and that the foregoing is complete, true, and correct.

Executed on November 20, 2009



Teresa Rancourt
Former President of the former
PCT Construction, Inc.

Mailing Address
c/o SA Service Company LLC
Former Registered Agent for the
Former PCT Construction, Inc.
701 Fifth Ave., Suite 4400
Seattle, WA 981104-7012